UNITED STATES TAX COURT WASHINGTON, DC 20217

DRC

| LAWRENCE W. DOYLE AND |) |
|-----------------------------------|------------------------|
| JOHN F. MOYNIHAN, |) |
| Petitioners, |)) |
| v. |) Docket No. 4865-19W. |
| COMMISSIONER OF INTERNAL REVENUE, | <i>)</i>) |
| Respondent |)) |

ORDER

The trial of this case will take place at the Court's session in Washington, D.C., beginning January 13, 2020, pursuant to notice previously given. On October 29, 2019, Brian R. Della Rocca, who has been counsel for petitioners Lawrence W. Doyle and John F. Moynihan, filed a motion to withdraw as counsel of record for petitioners. The motion does not include petitioners' current mailing address and telephone number, as is required by Rule 24(c). Therefore, it is

ORDERED that, no later than November 8, 2019, petitioner's counsel shall file a supplement to his motion to withdraw, in which he shall include all of the information required by Rule 24(c). It is further

ORDERED that the parties shall take note of the Court's prior instructions in the Standing Pretrial Order issued August 28, 2019--in particular, the requirements: (1) that the parties cooperate in preparing a stipulation of the agreed facts; and (2) that, no later than December 30, 2019, each party must (a) provide to the other party all the documents or materials that the party expects to offer into evidence at trial and that are not included in the stipulation; and (b) serve on the other party and file with the Court a pretrial memorandum that, among other things, identifies the witnesses that the party intends to call to testify at trial. It is further

ORDERED that, in addition to regular service, the Clerk of the Court shall serve a copy of this order on petitioners at the addresses listed for them in their petition filed March 11, 2019.

(Signed) David Gustafson Judge

Dated: Washington, D.C. October 30, 2019